

REMARKS

This Application has been carefully reviewed in light of the Final Action mailed September 4, 2002. No amendments have been made to the claims in this Response. Applicant respectfully requests reconsideration and favorable action in this case.

Claims 1-7 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Black, et al. in view of Shakib, et al. Applicant respectfully traverses this rejection.

The Black, et al. patent is directed to locating mobile objects in a distributed computer system. The Shakib, et al. patent is directed to data replication where a one way unacknowledged message is broadcast to locations where data has been replicated whenever data has been modified at a particular location. There is no disclosure or suggestion in either of these two references which allows them to be combined in the manner proposed by the Examiner. Absent such a disclosure or suggestion, a person skilled in the art looking for a solution to the problem of forwarding messages to an object that has moved within a distributed computer system would hardly be disposed on any objective basis to consider the mobile object locating technique of the Black, et al. with the data replication technique of the Shakib, et al. patent which has no disclosure with respect to object movement and shows absolutely no recognition of the problem for providing messages to objects that have moved to a different location let alone any structure capable of solving such problem. Thus, the cited references are not related to any common subject matter. Moreover, the Black, et al. and Shakib, et al. patents were classified in separate classifications within the U.S. Patent and Trademark Office. Further, the Examiner has merely provided a subjective "it would have been obvious" conclusory basis to support the

proposed combination without citing any objective language from either reference that supports the proposed combination. The Examiner has failed to show any capability that these references can be combined as has been proposed. Therefore, Applicant respectfully submits that the Examiner has improperly combined the Black, et al. and Shakib, et al. patents.

Moreover, even if the cited patents were capable of being combined, the structure that would result from the Examiner's proposed combination does not meet the terms of the claims. Independent Claim 1 recites ". . . retaining an old version of the first object at the current position; creating a forwarder object from the old version of the first object at the current position in response to establishing the first object at the new position" By contrast, the Black, et al. patent merely discloses maintaining a storage of a forwarding address and a time that an object has moved with no mention of the use of a forwarder object. Additionally, the Black, et al. patent provides no disclosure with respect to retaining an old version of the first object at the current location or creating a forwarder object from the old version of the first object at the current location as provided by the claimed invention. The Examiner readily admits that the Black, et al. patent does not retain an old version of the object or the creation of a forwarder object from the retained old version of the object. The Shakib, et al. patent makes no mention of creating a forwarder object for an object that has moved to a new location or retaining an old version of an object at a current location. The Shakib, et al. patent merely discloses providing a broadcast message upon a change in data that is sent to all locations where the data has been replicated and is being shared. The structure that would result from placing the data replication and update technique of the Shakib, et

al. patent into the system of the Black, et al. patent for locating mobile objects in a distributed computer system would still lack a capability to retain an old version of a first object at a current location that has moved to a new location and the creation of a forwarder object at the current location from the retained old version of the first object as provided by the claimed invention. Therefore, Applicant respectfully submits that Claims 1-7 are patentably distinct from the proposed Black, et al. - Shakib, et al. combination.

Applicant has now made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-7.

The present Response to Examiner's Final Action is necessary to address the Examiner's new grounds of rejection and newly cited art. This Response could not have been presented earlier as the Examiner has only now presented the new grounds of rejection and newly cited art.

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Respectfully submitted,

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